

September 30, 2005

Scott Smith
Aquatic Nuisance Species Coordinator
Washington Department of Fish and Wildlife
600 Capitol Way N.
Olympia, Washington 98501-1091

Dear Scott Smith:

The state legislature has set a July 1, 2007 deadline beyond which no discharge of unexchanged or untreated ballast water is allowed. Meeting this important goal is dependent on providing the shipping industry with a list of tested and approved ballast water treatment technologies. State rules set standards for this treatment. One standard is that treated ballast water must meet state water quality discharge laws. The Department of Ecology Water Quality Program is responsible for reviewing ballast water treatment proposals for compliance with this standard when they use biocides and making approval recommendations to your agency. We have completed our review of the BalPure™ electrochlorination system and the enclosed document contains our evaluation and recommendation.

We have reviewed the toxicity test results from the BalPure™ electrochlorination system which generates chlorine in seawater using electricity. The system also uses sodium sulfite for dechlorination. These toxicity test results were reviewed in light of the system controls which will be included in an installation on a vessel to make sure that neither the chlorine nor sodium sulfite concentrations become excessive. This comparison predicts with high confidence that the BalPure™ electrochlorination system can be operated without environmental harm. Chlorination followed by dechlorination is an established practice in municipal wastewater treatment and reliably produces a nontoxic effluent. The same should hold true for the BalPure™ electrochlorination ballast water treatment system. Therefore, we recommend conditional approval.

Solely because of the newness of the BalPure™ electrochlorination system, we recommend that the approval be conditional and allow installation on only one vessel while both its effectiveness in controlling unwanted species and environmental safety are checked in a trial period. The recommendation document contains a list of approval conditions that includes proper operation of system controls and conducting further toxicity testing during the trial.

If you have any questions, please contact me at: rmarr461@ecy.wa.gov or 360-407-6445.

Sincerely,

Randall Marshall
Whole Effluent Toxicity Coordinator

Enclosures

cc: Kevin Anderson, Program Manager, Aquatic Nuisance Species Program
Morris Barker, Program Manager, Marine Resources Program
Dave Peeler, Program Manager, Water Quality Program